REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

applicant adds new claim 40, hence claims 1-40 are all the claims pending in the application.

Applicant respectfully submits that the pending claims define patentable subject matter.

I.   Overview of the Office Action

This Office Action follows the Board of Patent Appeals and interferences agreeing with

Applicant's arguments and reversing the rejections in the prior Office Action. The Examiner

now rejects the claims over prior art the Examiner now cites for the first time. More specifically,

claims 1, 2, 5, 7-9, 14, 15, 18, 20-22, 27, 28, 31, and 33-35 are rejected under 35 U.S.C. § 102(e)

as being anticipated by Hedin et al. (U.S. Patent No. 6,185,535, hereafter "Hedin"). Claims 3,

16, and 29 are rejected under 35 U.S.C. 103(a) as being unpatentable over Hedin in view of

Alpdemir (U.S. Patent No. 6,658,389). Claims 4, 17, and 30 are rejected under 35 U.S.C. §

103(a) as being unpatentable over Hedin in view of Alpdemir and further in view of Devinney,

Jr. et al. (U.S. Patent Application Publication No. 2003/0046083, hereafter "Devinney").

Claims 6, 19, and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Hedin.

Claims 10-13, 23-26, and 36-39 are rejected under 35 U.S.C. § 103(a) as being unpatentable over

Hedin in view of King (U.S. Patent No. 6,532,446).

II.   Analysis

In the present application, a method is presented for entering data at a device 102 by

receiving voice data at the device 102 or 200 and transmitting the voice data and a device (unit)

identifier to a voice recognition server 104 or 210. Prior to the device transmitting the voice data

10

and unit identifier to the server, a user profile, which includes a "voice print" associated with the

way a user speaks; target applications in the device that are to receive data, and the unit identifier

are submitted to the voice recognition server where it is stored(page 5, lines 12-17). Upon

receipt of a speech packet from the user, the unit identifier is extracted and used to retrieve the

voice print of the user. Voice to text software 214 uses the voice print to translate the voice data

in the speech packet to text (page 6, lines 6-23). A determination is made whether to filter the

translated text (page 6, lines 9-23). If a determination is made that the translated text is to be

filtered, a filtering process is applied to the translated text by extracting keywords from the

translated text, and determining a transformation process that should be applied to the translated

text on the basis of the extracted keywords (page 6, lines 9-23). For example, if the extracted

keyword indicates that a calendar application is associated with the voice data, a calendar filter is

applied to the translated text (page 6, lines 15-21). The filtered text is then returned to the

mobile device 200 and incorporated into a calendar application on the mobile device (page 6,

line 22 to page 7, line 25).

Claim 1 recites in part:

> receiving voice data at the device; transmitting the voice data and a device
> identifier to a computer; and at the computer,

> translating the voice data to text;

> determining whether to filter the translated text; and

> if it is determined that the translated text is to be filtered, applying a filter
> to the translated text.

The Examiner alleges that Hedin discloses all of the features of independent claims 1, 14, and 27. Applicant respectfully traverses the above rejections.

To anticipate a claim, the reference must teach every element of the claim. See MPEP § 2131. Moreover, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989), cited in MPEP § 2131.

Hedin describes generally an interactive voice interface or a voice oriented browser which is used to access and control service applications. The system comprises a client device 101 which receives speech from a user, uses recognized speech to control the functions of the client device or converts recognized speech to text and transmits the text to a server 103 (column 5, lines 4-16). Unrecognized speech is formatted and sent to a server 103, which analyses the speech using a more powerful speech recognition system than the client device uses. Hedin states that this speech recognized by the server may control the server based on the analyzed speech, and if the recognized speech represents data, inputs that data into a server application. However if the server is still unable to recognize the speech after analyses, the server sends the encoded speech back to the client device for playback (column 5, lines 17-33).

Hedin discloses that a gateway/proxy part 107 is coupled to a server 109. If a data format on a link between the client 101 and the gateway 107 is different from a data format on a link 111 between the gateway 107 and the server 109, the gateway 107 converts the data to a suitable format (column 5, lines 43-49). Filtering may also be applied to weed out or prevent certain

12

types of data from being sent to the client device/terminal 101 (column 5, lines 48-49).

However, this filtering disclosed by Hedin relates to filtering data other than the data generated

from the recognized speech. This data that Hedin discloses filtering is, for example, web pages

that are retrieved for a command the server receives

     With respect to independent claims 1 and analogous independent claims 14 and 27, there

is no teaching or suggestion in Hedin of "determining whether to filter the translated text; and if

it is determined that the translated text is to be filtered, applying a filter to the translated text" as

recited in independent claim 1 and analogously recited in independent claims 14 and 27. The

Examiner cites column 5, lines 43-55 of Hedin as allegedly disclosing this feature of the claim.

However, this cited portion of Hedin merely discloses that if a data format on a link 105 between

the client 101 and the gateway 107 is different from a data format on a link 111 between the

gateway 107 and the server 109, the gateway 107 converts the data to a suitable format.

Contrary to the assertion of the Examiner, Hedin does not disclose applying a filtering process to

text that was translated from speech at the computer/server. Rather, Hedin merely teaches that

filtering may be applied to weed out data that cannot be received by the terminal, for example,

HTML web pages the server obtains to send to the terminal. For example, these HTML web

pages can include graphical pages that cannot be displayed on a low power terminal (column 5,

lines 45-55). Hedin simply does not disclose applying a filtering process to text data that was

translated from voice data received from the client device.

     Accordingly, Applicant submits that claims 1, 14, and 27 should be allowable because the

cited references, alone or in combination, do not teach or suggest all of the features of the claims.

Claims 2-13, 15-26, and 28-39 should be allowable at least based on their dependency on independent claims 1, 14, and 27.

In numbered paragraph 2 of the Office Action, the Examiner rejects claims 10 and 23 as allegedly being anticipated by Hedin. Applicant respectfully submits that the Examiner has not met his burden of establishing that Hedin anticipates these claims, as the Office Action does not identify how Hedin anticipates these claims.

With respect to the 35 U.S.C § 103(a) rejection of claim 10 and analogous claims 23 and 26, the Examiner acknowledges that Hedin does not teach or suggest "returning translated text to the device" as recited in dependent claim 10 and analogously recited in dependent claims 23 and 26, and relies on King to cure this deficiency.[1] Applicant respectfully disagrees with the Examiner's position.

King discloses generally a wireless communication system that utilizes a voice recognition server 109 to translate voice input received from mobile devices into a symbolic data file (column 2, lines 46-63). The translated data in the form of the symbolic data file is then sent to a user of the mobile device who edits the content of the symbolic data file and utilizes the file as desired.

Applicant respectfully submits that claim 10 and analogous claims 23 and 26 would not have been rendered obvious in view of the combination of Hedin and King as asserted by the

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[1] Page 8 of the Office Action dated November 8, 2006.

Examiner. In particular, one of ordinary skill in the art would not have been motivated to modify

Hedin to produce the claimed invention based on the teaching of King.

To establish a *prima facie* case of obviousness under 35 U.S.C. § 103, there must be

some suggestion or motivation to modify or combine the reference teachings. "To support the

conclusion that the claimed invention is directed to obvious subject matter, either references

must expressly or impliedly suggest the claimed invention or the examiner must present a

convincing line of reasoning as to why the artisan would have found the claimed invention to

have been obvious in light of the teachings of the reference." *Ex parte Clapp* 227 USPQ 972,

973 (Bd. Pat. App. & Inter. 1985).

There is simply no teaching or suggestion in Hedin of a need to receive translated data

from a server. Hedin teaches a system which uses voice data inputted at a mobile terminal as a

voice-oriented browser (column 6, lines 66-67). The voice inputs are used to control a web

server to obtain services that are specifically requested by the user (column 14, lines 10-26).

Hedin neither teaches nor suggests a need for translated text to be sent back to the user, since the

translated text in Hedin is used to obtain services/information from a server.

Further, there is no teaching or suggestion in King which would motivate one skilled in

the art to modify Hedin as alleged by the Examiner. Although the Examiner asserts that it would

have been obvious to one skilled in the art to modify Hedin by the teachings of King "for the

purpose (motivation) of improving the usability and commercial viability of network for using

15

speech recognition services",[2] Applicant respectfully submits that there is no suggestion or

motivation to modify or combine the reference teachings, and the Examiner has not provided any

objective reasoning why one of ordinary skill in the art would have been motivated to modify

Hedin in view of King to produce the claimed invention. Moreover, the Examiner does not

address how one of ordinary skill in the art would have been able to modify Hedin in view of

King to produce the claimed invention, since there is no apparent need in Hedin to send text data

that was translated from voice data back to a client device that sent the voice data.

New claim 40 is added which recites "wherein the device identifier comprises a unit

identifier which identifies a particular device operated by a user." This feature is supported at

least at page 5, lines 12-17 of the specification.

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.
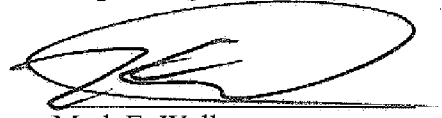
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[2] Page 9 of the Office Action dated November 6, 2006.

AMENDMENT UNDER 37 C.F.R. § 1.111 Attorney Docket: A8504
U.S. Patent Application No.: 09/690,313   Art Unit: 2626

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

                                            Respectfully submitted,

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17